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10 **ATTORNEYS FOR DEFENDANTS**

11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**
13 **WESTERN DISTRICT**

14 **DAVID HOUGH, et al.**

15 *Plaintiffs,*

16 **v.**

17 **RYAN CARROLL, et al.**

18 *Defendants.*

Case No.: 2:24-cv-02886

Assigned for all purposes to:
JUDGE WESLEY L. HSU

**DECLARATION OF RYAN
CARROLL ON BEHALF OF YAX
ECOMMERCE LLC D/B/A
WEALTH ASSISTANTS LLC IN
SUPPORT OF MOTION TO
RELEASE FUNDS**

Hearing: 1/10/2025, 1:30 p.m. PT

Action Filed: April 9, 2024
Trial Date: N/A

23
24 BEFORE ME, the undersigned authority, on this day personally appeared
25 **Ryan Carroll**, and being duly sworn upon his oath by me, deposed and stated as
26 follows:

27 1. "My name is **Ryan Carroll**. I am over eighteen (18) years of age, and I have
28 never been convicted of a crime. I am of sound mind and capable of making this

1 Declaration. The facts set forth herein are based on my personal knowledge and are
2 true and correct. I am competent to testify to the facts herein.

3 2. "I have sole and controlling interest in Yax Ecommerce.

4 3. "I submit this declaration to provide information regarding the source of funds
5 that I will use to pay legal counsel.

6 4. "Yax Ecommerce filed for bankruptcy on November 26, 2024 and a
7 Suggestion of Bankruptcy was filed with this Court on December 7, 2024. (Dkt.
8 177)

9 5. "I do not seek release of funds that are assets of Yax Ecommerce or in Yax
10 Ecommerce's name.

11 6. "I recently sold my vehicle, a 2017 Mercedes Benz G63, and will use the
12 proceeds from this sale to contribute toward my legal fees.

13 7. "I am prepared to allocate the availability of these funds and maintain my
14 defense.

15 8. "I am committed to ensuring the timely payment of all fees and costs
16 associated with my new legal representation to facilitate the progress of this matter.

17 I declare under the laws of the State of California that the foregoing is true
18 and correct."

19 FURTHER AFFIANT SAYETH NOT.

20 *Ryan Carroll*

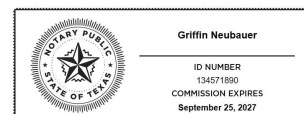
21 RYAN CARROLL

22 ²⁰²⁵ SWORN TO AND SUBSCRIBED before me on this 8th day of January,
23 20, by Ryan Carroll, who is personally known to me or has produced [form of
24 identification] as identification. PASSPORT

25 [Notary Seal]

26 NOTARY PUBLIC, State of Texas Denton County

27 My Commission Expires: 09/25/2027



CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document, and any attachments, will be served to counsel of record, in accordance with the governing rules of procedure regarding service in this court on this ***January 8, 2025***, via email as follows:

/s/ William Shibley
William Shibley